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3/18/21

United States Attorney
Southern District of New YorkThe Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

March 17, 2021

MEMO ENDORSED

3/18/21

Granted

*Brian McNeil*BY CM/ECF

The Honorable Colleen McMahon
 Chief United States District Judge
 Southern District of New York
 500 Pearl Street
 New York, NY 10007

Re: *United States v. Amir Bruno Elmaani, 20 Cr. 661 (CM)*

Dear Chief Judge McMahon:

The Government writes to respectfully propose to the Court a set of agreed-upon bail conditions for the defendant Amir Bruno Elmaani. Defense counsel joins in this proposal.

The terms are as follows:

- A personal recognizance bond of \$1,000,000, to be cosigned by two financially responsible persons, and to be secured by the following property: (i) 1792 Needy Road, Martinsburg, West Virginia (the "West Virginia Home"), and (ii) 336 Switch Road, Hope Valley, Rhode Island (the "Rhode Island Home");
- Pretrial Services supervision as directed;
- Home detention with location monitoring, at the West Virginia Home;
- Inspection and approval of the West Virginia Home by Pretrial Services, before the defendant's release;
- Surrender all travel documents and make no new applications;
- Attend mental health treatment as directed by Pretrial Services;
- Refrain from possession of a firearm, destructive device or other dangerous weapon;
- Surrender all firearms and permits and provide written verification of the same to Pretrial Services;
- Refrain from soliciting or engaging in investment, purchase, or exchange of cryptocurrencies or tokens; and
- Travel restricted to the Southern and Eastern Districts of New York and the Northern District of West Virginia, as well as the Districts necessary to travel in between those Districts.

The parties propose that all terms must be satisfied before the defendant's release.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney for the
Southern District of New York

By: ___/s Margaret Graham _____

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